

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Dec 20, 2024

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN DUANE WOODWORTH

Defendant.

Case No. 2:24-cr-165-RLP

STIPULATED PROTECTIVE
ORDER REGARDING
IDENTIFICATION OF MINOR
VICTIMS PURSUANT TO
18 U.S.C. § 3509

The Court has received and reviewed the parties' Stipulation for Protective

Order Regarding Identification of Minor Victims Pursuant to 18 U.S.C. § 3509

(ECF No. 23), filed by the parties in the above-captioned matter, and is fully

advised.

GOOD CAUSE HAVING BEEN SHOWN, the Court hereby ORDERS that
the Stipulation for Protective Order Regarding Identification of Minor Victims
Pursuant to 18 U.S.C. § 3509 (ECF No. 23) filed by the parties is **GRANTED**.

1. IT IS FURTHER ORDERED that the privacy protection measures
PROTECTIVE ORDER REGARDING IDENTIFICATION OF MINOR
VICTIMS PURSUANT TO 18 U.S.C. § 3509 - 1

1 mandated by 18 U.S.C. § 3509(d), which apply when a case involves a person
2 under the age of eighteen years who is alleged to be a victim of a crime of sexual
3 exploitation, or a witness to a crime committed against another person, apply to
4 this case.

5 2. IT IS FURTHER ORDERED that all persons acting in this case in a
6 capacity described in 18 U.S.C. § 3509(d)(1)(B), shall:

- 7 a. Keep all documents that disclose the names, identities, or any
8 other information concerning minors in a secure place to which
9 no person who does not have reason to know their contents has
10 access;
- 11 b. Disclose such documents or the information in them that
12 concerns minors only to persons who, by reason of their
13 participation in the proceeding, have reason to know such
14 information;
- 15 c. Not permit Defendant himself to review discovery outside the
16 presence of defense counsel or a defense investigator;
- 17 d. Not permit Defendant to keep discovery in his own possession
18 outside the presence of defense counsel or a defense
19 investigator; and
- 20 e. Not permit Defendant to keep, copy, or record the identities of
21 any minor or victim identified in discovery in this case.

PROTECTIVE ORDER REGARDING IDENTIFICATION OF MINOR
VICTIMS PURSUANT TO 18 U.S.C. § 3509 - 2

1
2 3. IT IS FURTHER ORDERED that all papers to be filed in Court that
3 disclose the names or any other information identifying or concerning minors shall
4 be filed under seal without necessity of obtaining a Court order, and that the person
5 who makes the filing shall submit to the Clerk of the Court:

6 a. The complete paper to be kept under seal; and
7 b. The paper with the portions of it that disclose the names or
8 other information identifying or concerning children redacted,
9 to be placed in the public record.

10 4. IT IS FURTHER ORDERED that the parties and the witnesses shall
11 not disclose minors' identities during any proceedings connected with this case.
12 The parties and witnesses will refer to alleged minor victims only by using agreed-
13 upon initials or pseudonyms (e.g., "Minor Victim 1"), rather than their bona fide
14 names, in motions practice, opening statements, during the presentation of
15 evidence, in closing arguments, and during sentencing.

16 5. IT IS FURTHER ORDERED that the government may produce
17 discovery to the defense that discloses the identity and images of alleged minor
18 victims in this case, in order to comply with the government's discovery
19 obligations. Defendant, the defense team, Defendant's attorneys and investigators,
20 and all of their externs, employees, and/or staff members, shall keep this
21 information confidential as set forth above.

PROTECTIVE ORDER REGARDING IDENTIFICATION OF MINOR
VICTIMS PURSUANT TO 18 U.S.C. § 3509 - 3

6. IT IS FURTHER ORDERED that this ORDER shall apply to any attorneys who subsequently become counsel of record, without the need to renew or alter the ORDER.

7. IT IS FURTHER ORDERED that this ORDER shall apply to the personal identifying information and images of any minors who are identified over the course of the case, whether or not such minors are known to the government and/or Defendant at the time the ORDER is entered by the Court.

IT IS SO ORDERED. The Clerk shall enter this Order and furnish copies to counsel.

Dated this 20th day of December, 2024.


REBECCA L. PENNELL
United States District Judge

PROTECTIVE ORDER REGARDING IDENTIFICATION OF MINOR
VICTIMS PURSUANT TO 18 U.S.C. § 3509 - 4